

LAW OFFICE OF GARY GREENBERG, ESQ.

666 Third Avenue, 10th Floor
New York, New York 10017

Phone: 212-765-5770
E-mail: gg@ggreenberglaw.com

May 23, 2022

By ECF

The Honorable Stewart D. Aaron
United States District Court
for the Southern District of New York
500 Pearl Street, Room 1970
New York, New York 10007

Re: Rohan Ramchandani v. Citigroup Inc., et al.,
Civil Action No. 1:19-cv-9124 (VM) (SDA)

Dear Judge Aaron:

On behalf of the Plaintiff Rohan Ramchandani, we write pursuant to ¶4 of your April 26, 2022 Order (the “Order”) to advise the Court that we have sent to Defendants’ counsel the attached schedule of the 50 documents we have selected for this Court’s *in camera* review.

Counsel met and conferred on May 20 and 23, 2022, in an attempt to reach agreement on the privilege/work product issues but were unable to reach agreement.

In general, we have selected for review, (a) fact memos containing a narrative of meetings between Citi and the DOJ¹; (b) emails/memos of meetings/communications at which public relations personnel were present; (c) emails/memos in which non-legal personnel were present; and (d) emails/memos where we were unable to discern from the description whether a valid privilege/work product claim was invoked.

Because of the volume of documents being withheld by Defendants, and the importance of these documents to Plaintiff’s case, we respectfully wish to advise the Court that we will shortly be filing a letter motion to compel, setting forth certain legal and factual arguments relating to the DOJ meeting memos, and communications involving public relations professionals that Defendants are withholding.

¹ During the meet and confer, we offered a bi-lateral exchange of emails/memos of meetings/communications between Citi and the DOJ.

Law Office of Gary Greenberg, Esq.

The Honorable Stewart D. Aaron

May 23, 2022

Page 2

Respectfully submitted,

LAW OFFICE OF GARY GREENBERG, E

By: 

Gary Greenberg

666 Third Avenue, 10th Floor

New York, New York 10017

Telephone: (212) 765-5770

gg@ggreenberglaw.com

LAW OFFICE OF DAVID R. LURIE, PLLC

194 President Street

Brooklyn, New York 11231

Telephone: (347) 651-0194

david@davidlurielaw.com

Counsel for Plaintiff

cc: Samuel J. Rubin (By ECF)